

UNITED STATES DEPARTMENT OF JUSTICE  
WASHINGTON, D.C. 20530

SUPPLEMENTAL STATEMENT

Pursuant to Section 2 of the Foreign Agents  
Registration Act of 1938, as Amended

RECEIVED  
CRIMINAL DIVISION  
JUN 10 2 55 PM '82  
INTERNAL SECURITY  
SECTION  
REGISTRATION UNIT

For Six Month Period Ending 13 MAY 1982  
(Insert date)

Name of Registrant  
Prather Seeger Doolittle & Farmer

Registration No. 1815

Business Address of Registrant  
1101 Sixteenth Street, N. W.  
Washington, D. C. 20036

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in Item 1.

N. A.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection  
Ended

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? ☐ Yes ☒ No

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? Yes ☐ No ☐

If yes, identify each such person and describe his services.

N. A.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or connection	Date terminated
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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Position or connection	Date connection began
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## II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

*Name of foreign principal*  
Empresa de Transporte Aereo del Peru  
Joseph E. Seagram & Sons, Inc.  
Ruhrkohle, A.G.

*Date of Termination*  
5/1/82  
5/1/82  
5/1/82

9. Have you acquired any new foreign principal<sup>1</sup> during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

*Name and address of foreign principal*

*Date acquired*

The Government of the Federal Republic of Nigeria  
Lagos, Nigeria

1/11/82

10. In addition to those named in Items 8 and 9, if any, list the foreign principals<sup>1</sup> whom you continued to represent during the 6 month reporting period.

The Royal Bank of Canada

## III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

Empresa de Transporte Aereo del Peru: General legal services.

Joseph E. Seagram & Sons, Inc.: General legal services.

Ruhrkohle, A.G.: General legal services.

The Government of the Federal Republic of Nigeria: General legal representation on economic and other matters arising under domestic and international law, including assessing trends in U.S. policies, identifying support for economic development in Nigeria, encouraging private investment and expansion of the markets for Nigerian exports, monitoring congressional and administrative activities involving issues affecting southern African nations.

The Royal Bank of Canada: In addition to general legal services, telephone and personal contacts with various officials from the Treasury Department and Federal Reserve System on issues and concerns being raised in the area of U.S.-Canadian banking relations.

<sup>1</sup> The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?

Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

The Royal Bank of Canada: On behalf of Royal Bank, we have sought to keep in contact with U.S. officials involved in U.S./Canadian banking relations. The purpose of such contacts has been to determine U.S. attitudes toward the treatment of Canadian banks in the U.S. and the extent to which such attitudes are being adversely affected by the treatment of U.S. banks in Canada and general U.S./Canadian trade and investment problems.

See Attachment

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes ☐ No ☒

If yes, describe fully.

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<sup>2</sup> The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

# IV - FINANCIAL INFORMATION

## 14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>3</sup>

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
1/7/82	Empresa de Transporte Aereo del Peru	Legal fees & expenses	\$ 7,986.87
1/18/82	Empresa de Transporte Aereo del Peru	Legal fees & expenses	7,464.30
3/31/82	Empresa de Transporte Aereo del Peru	Legal fees & expenses Total	<u>7,510.38</u> \$22,961.55
2/16/82	Joseph E. Seagram & Sons, Inc.	Legal fees & expenses	\$ 4,015.25
11/16/81	Ruhrkohle, A.G.	Legal fees & expenses	\$56,133.99
4/14/82	Ruhrkohle, A.G.	Legal fees & expenses Total	<u>6,800.00</u> \$62,933.99

See Attachment

Total

## 14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>4</sup> other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☒ No ☐

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
Nigeria	1/8/82	Nigerian Airways airline ticket USA to Lagos & return	Travel to Nigeria

<sup>3</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

<sup>4</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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I. Empresa de Transporte Aereo del Peru

During the reporting period, the following disbursements were made on behalf of Empresa de Transporte Aereo del Peru:

Reporting Period	C&P Telephone	\$ 251.29
Reporting Period	Photocopying	57.40
Reporting Period	Courier & Messenger Services	122.00
Reporting Period	Postage - U.S. Post Office	24.77
Reporting Period	Local travel - Taxis, etc.	8.30
Reporting Period	ITT - telex	75.70
	Total	\$ 539.46

See Attachment

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Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value<sup>5</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Date disposed	Name of person to whom given	On behalf of what foreign principal	Description of thing of value	Purpose
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(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>5</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☒ No ☐

If yes, furnish the following information:

Contributor	Date	Amount or thing of value	Name of political organization	Name of candidate
T. L. Farmer	12/5/81	\$100.00	Friends of Phil Sharp Com.	Phil Sharp
	1/26/82	\$ 50.00	Citizens for Sarbanes	Paul Sarbanes
	2/5/82	\$125.00	Citizens for Sarbanes	Paul Sarbanes
	2/18/82	\$150.00	Shamansky for Congress Com.	Robert Shamansky
	3/6/82	\$ 25.00	Shackleton Re-Election Com.	Polly Shackleton
E. H. Seeger	2/5/82	\$125.00	Citizens for Sarbanes	Paul Sarbanes
C. B. Nelson	2/13/82	\$ 25.00	Betty Anne King for Mayor or	Betty Anne King
G. M. Welsh	12/11/81	\$100.00	Stevenson for Illinois Com.	Adlai E. Stevenson

V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

<sup>5</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?  
Yes ☐ No ☐

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

- 
19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts    ☐ Magazine or newspaper articles    ☐ Motion picture films    ☐ Letters or telegrams  
☐ Advertising campaigns    ☐ Press releases    ☐ Pamphlets or other publications    ☐ Lectures or speeches  
☐ Other (specify) \_\_\_\_\_

- 
20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials    ☐ Newspapers    ☐ Libraries  
☐ Legislators    ☐ Editors    ☐ Educational institutions  
☐ Government agencies    ☐ Civic groups or associations    ☐ Nationality groups  
☐ Other (Specify) \_\_\_\_\_

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21. What language was used in this political propaganda:

☐ English    ☐ Other (specify) \_\_\_\_\_

- 
22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?

Yes ☐ No ☐

- 
23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act?    Yes ☐ No ☐

- 
24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?

Yes ☐ No ☐

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## VI - EXHIBITS AND ATTACHMENTS

### 25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A<sup>6</sup>    Yes ☒ No ☐

Exhibit B<sup>7</sup>    Yes ☒ No ☐

If no, please attach the required exhibit.

- (a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits?    Yes ☒ No ☐

If no, please attach the required amendment.

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<sup>6</sup> The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

<sup>7</sup> The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.



26. EXHIBIT C

If you have previously filed an Exhibit C<sup>8</sup>, state whether any changes therein have occurred during this 6 month reporting period.

Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☐ No ☐

If no, list names of persons who have not filed the required statement.

N. A.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Thomas L. Farmer  
Thomas L. Farmer

Gary M. Welsh  
Gary M. Welsh

Subscribed and sworn to before me at 1412 K ST NW

this 10th day of June, 19 82

Francine D. Rose  
(Signature of notary or other officer)  
**MY COMMISSION EXPIRES**  
**JULY 14, 1988**

<sup>8</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.)

12. The Royal Bank of Canada - (continued)

Following is a list of all U.S. officials contacted during the Reporting Period. In all cases, the matters discussed concerned U.S./Canadian banking and investment relations.

Department of the Treasury

Mr. Marc Leland, Assistant Secretary of the  
Treasury for International Affairs  
2/11/82, 4/2/82

Mr. James Ammerman, Director of International  
Banking and Portfolio Investment  
1/21/82, 3/2/82, 3/9/82 and 4/2/82

Federal Reserve System

Mr. Henry Wallich, Governor, Federal Reserve  
Board -- 1/28/82

Mr. Anthony Solomon, President, Federal Reserve  
Bank of New York -- 11/25/81

ATTACHMENT ITEM 14(a)

Receipts - Monies

Date	From Whom	Purpose	Amount
3/1/82	The Government of the Federal Republic of Nigeria	Retainer	\$20,000.00

Receipts of monies from The Royal Bank of Canada<sup>\*/</sup> during the  
reporting period

<u>Date</u>	<u>Purpose</u>	<u>Amount</u>
1/4/82	Fee	\$11,550.00
	Reimbursement for Expenses	1,512.57
2/22/82	Fee	\$ 2,700.00
	Reimbursement for Expenses	2,268.01
3/3/82	Fee	\$ 8,650.00
	Reimbursement for Expenses	793.11
3/23/82	Fee	\$11,600.00
	Reimbursement for Expenses	238.34
4/19/82	Fee	\$ 5,000.00
	Reimbursement for Expenses	1,309.70
	Total	<u>\$45,621.73</u>

\*/ Fees and reimbursements represent payments for both regis-  
trable and exempt activities during the period.

15. (a) Disbursements - Monies (continued)

II. Ruhrkohle, A.G.

During the reporting period, the following disbursements were made on behalf of Ruhrkohle, A.G.:

Reporting Period	C&P Telephone	\$ 477.32
Reporting Period	Photocopying	6.90
Reporting Period	Courier & Messenger Services	240.25
Reporting Period	Postage - U.S. Post Office	25.70
Reporting Period	Miscellaneous - Notary fee	2.00
Reporting Period	Local travel - taxis	6.00
Reporting Period	Business Meals	41.21
Reporting Period	Travel	49.23
	Total	\$ 848.61

III. The Government of the Federal Republic of Nigeria

During the reporting period, the following disbursements were made on behalf of The Government of the Federal Republic of Nigeria:

Reporting Period	C&P Telephone	\$ 641.28
Reporting Period	Photocopying	89.22
Reporting Period	Courier & Messenger Services	176.50
Reporting Period	Postage - U.S. Post Office	6.13
Reporting Period	Local travel - taxis, etc.	26.05
Reporting Period	Business meals	72.50
Reporting Period	Publication	3.71
Reporting Period	Travel	1,603.07
Reporting Period	Miscellaneous	64.65
	Total	\$ 2,683.11

15. (a) Disbursements - Monies (continued)

IV. The Royal Bank of Canada

During the reporting period, the following disbursements were made on behalf of The Royal Bank of Canada:

Reporting Period	C&P Telephone	\$ 1,111.06
Reporting Period	Courier & Messenger Services	1,519.27
Reporting Period	Photocopying & Printing	1,895.14
Reporting Period	Postage - U.S. Post Office	261.44
Reporting Period	Local travel - taxis	59.00
Reporting Period	Travel to Montreal and Canada	784.67
Reporting Period	Publications	615.48
Reporting Period	Business meals, miscellaneous	181.62
	Total	<u>\$ 6,427.68</u>

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REGISTRATION UNIT  
CRIMINAL DIVISION  
WASHINGTON, D. C. 20530

RECEIVED  
CRIMINAL DIVISION  
JUN 10 2 55 PM '82  
INTERNAL SECURITY  
SECTION  
REGISTRATION UNIT

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes \_\_\_\_\_ or No x \_\_\_\_\_

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes \_\_\_\_\_ or No \_\_\_\_\_

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Gary M. Welsh  
Signature

June 10, 1982  
Date

GARY M. WELSH  
Please type or print name of  
signatory on the line above

Partner  
Title